

Cost Effective/ Small Business-Smart Application of OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Standard on USACE HTRW Remedial Action Projects

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OSHA's HAZWOPER standard (29 CFR 1910.120/ 29 CFR 1926.65) is a good standard, and when properly applied, provides needed protection for hazardous waste site cleanup workers. The good news is that the hazardous waste site cleanup industry has matured and most project planners understand how the standard works and have developed smooth, easy processes for implementing it on a corporate and project specific level. The bad news is that cleanup industry project planners do a poor job of evaluating HAZWOPER standard applicability, and often times require the standard to be implemented where it is not necessary. Inappropriate application of the HAZWOPER standard is costly and burdens small business program performance. This presentation will elaborate on the following three points: 1) When, and more importantly, when not to apply OSHA's HAZWOPER standard; 2) Cost benefits of appropriate HAZWOPER application; and, 3) Small business program performance improvement opportunities, where the standard is appropriately applied.